

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA.
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CLERK
U.S. BANKRUPTCY COURT
CWP

IN RE: MAROUAN HAJMABROUK

Debtor.

CASE NO.: 1:19-bk-04953-HWV

CHAPTER 7

TOYOTA MOTOR CREDIT
PO BOX 9786
CEDAR RAPIDS, IA 52409

Movant.

Related to Doc. 21

OBJECTION TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Now come (s) the Debtor (s), Marouan HajMabrouk, and hereby submits this opposition to the Motion of relief from automatic stay, filed by Toyota Motor Credit Corporation.

In support thereof debtor alleges as follows:

1. Debtor (s) admit the allegations of paragraph 1.
2. Debtor (s) admit the allegations of paragraph 2.
3. Debtor (s) admit the allegations of paragraph 3.
4. Debtor (s) admit the allegations of paragraph 4.
5. Debtor (s) admit the allegations of paragraph 5.
6. Debtor (s) admit the allegations of paragraph 6.
7. Debtor (s) admit the allegations of paragraph 7.
8. Debtor (s) admit the allegations of paragraph 8.
9. Debtor (s) is without knowledge or information sufficient to form a belief as to the truth of the averment in paragraph 9 and therefore deny same.
10. Debtor (s) admit the allegations of paragraph 10.
11. Debtor (s) deny the allegations of paragraph 11.
12. Debtor (s) deny the allegations of paragraph 12.

WHEREFORE, the Debtor (s) respectfully pray the Court enter its Order denying relief from the automatic stay and for such further Orders as this Court deems appropriate.

Date: January 29, 2020

Respectfully submitted,

/s/ MAROUAN HAJMABROUK

Debtor (s)

314 W Snyder St

Selinsgrove, PA 17870

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CERTIFICATE OF SERVICE

I, Marouan HajMabrouk do hereby certify that I have served the foregoing Objection to
motion for relief from the automatic stay upon the following recipients:

James C. Warmbrodt, Esquire 701 Market Street, Suite 5000 Philadelphia, PA 19106 <i>Creditor's attorney</i>	Lawrence G. Frank lawrencegfrank@gmail.com <i>Chapter 7 Trustee</i>	228 Walnut Street Suite 1190 Harrisburg, PA 17101 <i>US Trustee</i>
N/A	N/A	N/A

Method of Service: electronic means or U.S. First Class Mail.

Date: January 29, 2020

/s/ Marouan HajMabrouk
Debtor (s)
314 W Snyder St
Selinsgrove, PA 17870
570-540-2193